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November 2, 2023

**VIA ECF**

Honorable Brian Cogan  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

Re: Justin Sherwood v. City of New York, et al., 22-cv-7505 (BC)

Your Honor:

I am a Senior Counsel in the office of Hon. Sylvia O. Hinds-Radix, Corporation Counsel of the City of New York, representing defendants City of New York, Officer Reis, and Officer Sturman. The parties have come to an agreement on the de-designation of various items previously designated as “Confidential.” Defendants will re-produce the items requested by plaintiff in their motion (ECF 68-15 at A1-A5), removing the “Confidential” designation and with limited redactions, by November 10, 2023, with the exception of one document the parties have agreed will remain confidential. The parties have agreed that the redactions will pertain to names of civilian, non-party witnesses who have not provided defendants written consent to have their names revealed, personal identifying information, namely, social security numbers, dates of birth, personal and/or home addresses, phone numbers, and e-mail addresses, *except* the phone numbers and e-mail addresses that were involved in the underlying investigations, which Defendants shall only redact as follows: Defendants will redact the first 6 digits of any such phone number (leaving the last four) and will redact what follows the “@” in the second portion of any such e-mail addresses (for example, “@gmail.com”). Defendants shall not redact the names of NYPD members. Plaintiff has agreed to withdraw his motion upon receipt of these documents, because we have reached this agreement, the parties believe that no further response to plaintiff’s motion is required.

The parties will advise the Court on the resolution of this issue and their positions with regard to items sealed by the Court pending this motion by November 13, 2023.

Thank you for your consideration herein.

Respectfully submitted,

/s/

John Schemitsch

*Senior Counsel*

cc: **VIA ECF**  
*All Counsel of Record*